The Facebook, Inc. v. Connectu, LLC et al
Doc. 245 Att. 12

EXHIBIT L2

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

THEFACEBOOK, INC.,

Plaintiff,

-against- Case No. 1:05-CV-047381

CONNECTU LLC, CAMERON WINKLEVOSS, TYLER WINKLEVOSS, HOWARD WINKLEVOSS, DIVYA NARENDRA and DOES 1-25,

Defendants.

CERTIFIED COPY

Confidential (outside counsel eyes only) videotaped deposition of CONNECTU LLC by CAMERON WINKLEVOSS, pursuant to Order, held at the offices of Orrick Herrington & Sutcliffe, 666 Fifth Avenue, New York, New York, on Monday, January 16, 2006, commencing at 12:36 p.m., before Thomas DelVecchio, James W. Johnson, Registered Professional Reporter and a Notary Public of the State of New York.

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ALSO PRESENT:
Howard Winklevoss
Tyler Winklevoss

services performed by Pacific Northwest Software?

MR. MOSKO: I believe that question lacks foundation.

A. I'm still a little confused as to what you're asking me.

Q. I'm only trying to figure out, why were Wayne Chang and David Gucwa both involved with this e-mail relating to importer, if you know as ConnectU?

MR. MOSKO: I'll object to that question as calling for speculation as to what Mr. Winklevoss understands or believes is the import of that communication that came from somebody else.

A. Could you please repeat the question.

(Record read.)

A. Because I feel that it was, the initial e-mail was addressed to Wayne Chang.

Q. Was importer developed by both Pacific Northwest Software and i2Hub? Or --

A. It was developed by Winston. I2Hub, I believe, was aware of it.

(PJ Exhibit 20, E-Mail dated July 13, 2004 from Cameron Winklevoss to Marc Pierrat, Bates Stamped C006398, marked for

16:04 C E R T I F I C A T E

16:04

16:04 STATE OF NEW YORK)

16:04) Ss

16:04 COUNTY OF NEW YORK)

16:04

16:04 I, JAMES W. JOHNSON, a Registered Professional Reporter and Notary Public within and for the State of New York, do hereby certify:

16:04 That CAMERON WINKELVOSS, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by such witness.

16:04 I further certify that I am not related to any of the parties to this action by blood or marriage and that I am in no way interested in the outcome of this matter.

16:04 IN WITNESS WHEREOF I have hereunto set my hand this 19th day of January 2006.

JAMES W. JOHNSON
Registration #01J05000925
Commission Expires 9/4/2006